

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

2018 AUG 16 P 1:59

CLERK US DISTRICT COURT
ALEXANDRIA, VIRGINIA

UNITED STATES OF AMERICA,

vs.

PAUL J. MANAFORT, JR.,

Defendant.

Criminal Action No.: 1:18-cr-83

**MEDIA COALITION MOTION TO INTERVENE
AND FOR ACCESS TO CERTAIN PORTIONS OF THE RECORD**

By and through undersigned counsel, Cable News Network, Inc. ("CNN"); The Associated Press ("AP"); BuzzFeed, Inc. ("BuzzFeed"); NBCUniversal Media, LLC ("NBC"); The New York Times Company ("The Times"); POLITICO LLC ("Politico"); and WP Co., LLC, d/b/a/ The Washington Post (the "Post") (collectively, the "Media Coalition") respectfully move this Court for leave to intervene in this matter for the limited purpose of seeking an order providing access to certain portions of the record in this case that are presumptively public pursuant to the common law and the First Amendment.

Specifically, and as described more fully in the accompanying Memorandum, the Media Coalition seeks access to: (1) the names and addresses of the jurors and alternates; (2) the sealed records at Dkts. 228, 229, 235 and 239; (3) the sealed portions of the sidebar transcript subject to the Order of August 9, 2018 (Dkt. 221); and (4) any other records or transcripts that have been sealed that may not appear on the public docket.

WHEREFORE, for the reasons stated herein and in the accompanying Memorandum, the Media Coalition respectfully requests that the Court enter an order granting the Media Coalition leave to intervene and unsealing the requested portions of the record.

REQUEST FOR EXPEDITED HEARING

The Fourth Circuit has recognized that, especially in high-profile cases such as this one, access to public information should be provided as quickly as possible. *Company Doe v. Pub. Citizen*, 749 F.3d 246, 272 (4th Cir. 2014) (“[T]he value of openness . . . is threatened whenever immediate access to ongoing proceedings is denied, whatever provision is made for later public disclosure.”) (citation omitted). The Media Coalition therefore respectfully requests that the Court schedule a hearing, either telephonically or in person, regarding this Motion on Friday, August 17, 2018, or at its earliest convenience.

Respectfully submitted,

Dated: August 16, 2018

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CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of August, 2018, I caused true and correct copies of the foregoing Media Coalition Motion to Intervene and For Access to Certain Portions of the Record, along with true and correct copies of the Memorandum in support thereof, the proposed order, and the Corporate Disclosure Statements, to be served via electronic mail and U.S. Mail on the following counsel of record:

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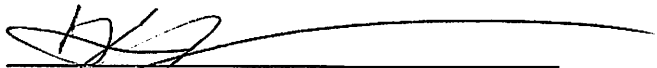
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